

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ZAG AMERICA, LLC

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendants.

Civil Action No.: 1:20-cv-13

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff, Zag America, LLC, ("ZAG" or "Plaintiff"), by its undersigned counsel, hereby files this Motion requesting leave to file the following documents under seal: (1) Plaintiff's Schedule A attached to the Complaint, which includes a list of the Defendant Online Marketplace Accounts; and (2) screenshot printouts showing the active Defendant Internet Stores for the Defendant Online Marketplace Accounts (Exhibit 3 to the Declaration of Scott Murata).

In this action, ZAG is requesting temporary *ex parte* relief based on an action for: trademark infringement and counterfeiting; false designation of origin, passing off and unfair competition; violation of the Illinois Uniform Deceptive Trade Practices Act; and copyright infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would

frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, ZAG will move to unseal these documents.

Dated: January 2, 2020

Respectfully submitted,

/s/ Ann Marie Sullivan

Ann Marie Sullivan (Bar No. 6325887)

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